

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Numbering Resource Optimization) CC Docket No. 99-200

COMMENTS OF THE GEORGIA PUBLIC SERVICE COMMISSION

The Georgia Public Service Commission (GPSC) hereby submits its comments with respect to the proposed national thousands-block number pooling rollout schedule (rollout schedule) developed by NeuStar, Inc., the National Thousands-Block Number Pooling Administrator.

I. BACKGROUND

On October 17, 2001, the Common Carrier Bureau of the Federal Communications Commission (FCC) issued its Public Notice seeking comment on the rollout schedule, particularly the structure of the rollout schedule and the proposed dates for implementing thousands-block pooling for specific numbering plan areas (NPAs). The rollout schedule is divided into three-month segments, and establishes number pools in approximately twenty-one NPAs each quarter, with an initial concentration on NPAs in the top 100 MSAs.

In the Supplement to its Petition for Additional Delegated Authority to Implement Number Conservation Measures¹, the GPSC requested that the FCC include the new NPA with the Atlanta MSA be included in the initial round or rounds of the national pooling rollout in order to ensure more efficient

¹ *Supplement to the Georgia Public Service Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures*, CC Docket No. 96-98.

number utilization and protect the customers of telecommunications services in Georgia from the repeated expense and confusion of area code relief measures. The rollout schedule described in the Common Carrier Bureau's Public Notice specifically recognizes the concerns raised by the GPSC in its Petition by establishing number pools in the 404, 678 and 770 NPAs in the first quarter, beginning in March, 2002. Additionally, the rollout schedule establishes number pools in the 478, 912 and 229 NPAs in the sixth quarter, and in the 706 NPA in the seventh quarter.

II. DISCUSSION

In its Petition for Additional Delegated Authority to Implement Number Conservation Measures, as well as the two Supplements thereto², the GPSC has described both the difficult problems facing the GPSC as it attempts to conserve NXX codes, as well as the continuing number conservation efforts pursued by the GPSC. The GPSC continues to believe that the implementation of thousands-block number pooling in Georgia is an important step in ensuring more efficient number utilization and protecting the citizens of Georgia from repeated expense of area code relief measures. Accordingly, the GPSC supports the efforts of NeuStar, Inc., and endorses the structure of the rollout schedule, including the proposed dates for implementing thousands-block number pooling in the Georgia NPAs. The GPSC believes that the implementation of thousands-block number pooling in the 404, 678 and 770 NPAs in the first quarter, together with the measures adopted by the GPSC such as Rate Center Consolidation, will provide necessary relief to the existing NPAs in the Atlanta MSA. The GPSC has also implemented an all services overlay and added a new NPA, 470, in the Atlanta MSA. The implementation of thousands-block number pooling in the 404, 678 and 770 NPAs will also delay the premature exhaust of the 470 NPA. Additionally, the GPSC believes that the implementation of thousands-block number pooling in the 478, 912, 229 and 706 NPAs will help prolong the lives of those NPAs by efficiently allocating numbering resources.

III. CONCLUSION

² The *Georgia Public Service Commission's for Additional Delegated Authority to Implement Number Conservation Measures*, CC Docket No. 96-98; *Supplement to the Georgia Public Service Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures*, CC Docket Nos. 96-98 and 99-200; *Second Supplement to the Georgia Public*

The GPSC continues to support the FCC's efforts to address the number resource exhaust problem at a national level. The GPSC continues to believe that the implementation of thousands-block number pooling in Georgia's NPAs will help ensure efficient number utilization. The GPSC fully supports and endorses the structure of the rollout schedule described in the Public Notice issued by the FCC's Common Carrier Bureau, including the proposed dates for implementing thousands-block number pooling in the Georgia NPAs.

Respectfully submitted,

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